

**PYLE, ROME, LICHTEN, EHRENBURG & LISS-RIORDAN, P.C.**

Attorneys at Law  
18 Tremont Street, Suite 500  
Boston, MA 02108

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Telephone (617) 367-7200  
Fax (617) 367-4820

Tod A. Cochran  
OF COUNSEL

Warren H. Pyle  
David B. Rome  
Harold L. Lichten\*  
Betsy Ehrenberg  
Shannon Liss-Riordan\*\*  
Terence E. Coles  
Katherine D. Shea

M. Amy Carlin  
Nicole Horberg Decter\*\*  
Rebecca G. Pontikes  
Alfred Gordon  
Leah M. Barrault

September 22, 2005

\*Also admitted in Maine

\*\*Also admitted in New York

**VIA HAND DELIVERY**

The Honorable William G. Young  
Chief Judge, United States District Court  
District of Massachusetts  
One Courthouse Way  
Boston, MA 02210

RE: Coverall North America, Inc. v. Padilha, No. 05-11867 (MLW)  
Coverall North America, Inc. v. Lisboa, No. 05-11868 (RWZ)  
Coverall North America, Inc. v. Canestraro, No. 05-11869 (WGY)  
Coverall North America, Inc. v. Martins, No. 05-11870 (MLW)  
Coverall North America, Inc. v. Pereira, No. 05-11871 (RCL)  
Coverall North America, Inc. v. Furtado, No. 05-11872 (RGS)  
Coverall North America, Inc. v. De Carvalho, No. 05-11873 (MLW)  
Coverall North America, Inc. v. Sodre, No. 05-11874 (MLW)  
Machado et al. v. Coverall North America, Inc., No. 05-11884 (RGS)

Dear Chief Judge Young:

I am writing to you in your capacity as Chief Judge to bring to your attention the filing of the above-referenced nine related lawsuits. I represent a group of more than ten non-English speaking immigrant janitorial workers who have claims that they seek to

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bring on a classwide basis against Coverall North America, Inc. ("Coverall"). These claims include wage claims, misrepresentation, misclassification of the workers as independent contractors, unfair and deceptive business practices, breach of contract, and others.

Knowing that these workers were preparing to file a class action lawsuit in which they would seek a ruling invalidating Coverall's mandatory arbitration policy, Coverall took the preemptive step of filing eight separate lawsuits against a number of these workers, seeking orders compelling them to arbitrate their claims. Thus, there are now eight separate lawsuits pending on this same issue before five different judges and an additional lawsuit filed by the workers against Coverall. I am enclosing a copy of the workers' class action complaint and one of the eight virtually identical complaints filed by Coverall against the workers.

It appears that these cases should all be consolidated. I am bringing this to your attention so as not to take up the time of five different judges to address this issue.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Shannon Liss-Riordan".

Shannon Liss-Riordan

cc: Michael Vhay, Esq.